

K&L GATES

March 21, 2025

By ECF

Hon. Margo K. Brodie
United States District Court
Eastern District of New York
225 Cadman Plaza East
Courtroom 6F
Brooklyn, New York 11201

Benjamin I. Rubinstein
Partner
Benjamin.Rubinstein@klgates.com

T +1 973 848 4140
F +1 973 848 4001

***Re: VIVIAN JOHNSON v. DIMORA BRANDS, INC, WATERMARK DESIGNS,
BROOKLYN, and Does 1-10, Case No. 1:25-cv-01195***

Dear Chief Judge Brodie:

Defendants Dimora Brands, Inc. and Watermark Designs, Brooklyn (“Defendants”), by and through counsel, hereby submit this consented letter motion requesting that this Court extend the time for the Defendants to respond to Plaintiff Vivian Johnson’s (“Plaintiff”) (Plaintiff and Defendants collectively the “Parties) Complaint (ECF Doc. 1) to **April 30, 2025** (the “Consented Letter Motion”). In support of this Consented Letter Motion, the Defendants state:

- 1) Plaintiff served Defendants Dimora Brands, Inc. and Watermark Designs, Brooklyn on March 10, 2025.
- 2) Plaintiff returned the Summons executed on March 12, 2025 (ECF Doc. 6).
- 3) Defendants’ response to Plaintiff’s Complaint (ECF Doc. 1) is currently due March 31, 2025 (21 days from when Defendants were served).
- 4) This is the Parties’ first request to extend Defendants’ time to respond to Plaintiff’s Complaint.
- 5) The purpose of the extension is to allow the parties to engage in settlement discussions and to see if resolution is possible prior to Defendants filing a responsive pleading.
- 6) All named Parties consent to this extension and agree that such extension will not prejudice any of the Parties.
- 7) This requested extension will not affect any other deadlines in this action as a scheduling order has not been entered.

For the foregoing reasons, Defendants request that the Court grant the Consented Motion and enter an order extending the deadline by which Defendants must respond to the Complaint until April 30, 2025. Defendants thank the Court in advance for its consideration of this consented request for extension.

Respectfully Submitted,
Counsel for the Defendants:

/s/ Benjamin I. Rubinstein

Benjamin I. Rubinstein
K&L GATES LLP
599 Lexington Avenue
New York, New York 10022
Tel.: (212) 536-3900
Fax: (212) 536-3901

benjamin.rubinstein@klgates.com

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing CONSENTED LETTER MOTION was served by CM/ECF on March 21, 2025 on all counsel or parties of record listed below.

Scott Alan Burroughs, Esq.
David Michael Stewart Jenkins, Esq.
DONIGER/BURROUGHS
247 Water Street, First Floor
New York, New York 10038
djenkins@donigerlawfirm.com
scott@donigerlawfirm.com

/s/ Benjamin I. Rubinstein
Benjamin I. Rubinstein